

COMPARISON CHART: OLD AND NEW NASM STANDARDS AND REQUIREMENTS

Material Standards and Requirements

Standard/ Requirement	Old	New	Rationale
Testing for metals	Required for higher risk None for lower risk materials (e.g., vegetable peels)	Same unless lower risk materials are applied at higher rate then testing required	Maintain protection
Testing for pathogens	Required for those generating higher risk material that is currently regulated by Nutrient Management Act No testing for lower risk materials like vegetable peels	Required for all materials containing human waste, and other materials wishing to prove low pathogen levels None for lower risk	More protective of health and environment Encourages treatment of more materials to prove lower pathogen levels
Approval process	Certificate of Approval (C of A) for higher risk No testing for lower risk	Must have a registered NASM plan in place for medium risk materials (such as bakery waste that meet low metal levels) Must have an OMAFRA-approved NASM plan for higher risk (e.g., sewage biosolids and paper biosolids) None for lower risk	NASM plan looks at nutrient content and quality of materials Regulation provides the standards and land application requirements typically found in Certificates of Approval Ensures standards are met. Testing must be completed and results provided to farmer before material land applied

Agricultural Standards & Requirements

Standard/ Requirement	Old	New	Rationale
Testing soil	Required for higher risk; none for lower risk	Same	Maintain protection
Testing nutrients	Required for higher risk; none for lower risk	Required for higher risk; none for lower risk unless application rate increases	Increases protection when more lower risk materials are applied
Testing parameters	Testing required on a case- by- case basis at the time of CofA application	Testing requirements identified for specific materials in regulation (sodium, boron, fats, oils & greases). Director has authority to request additional testing of other parameters (e.g., emerging contaminants like thallium)	Clarify up front what parameters must be tested for and what the limits are for each categorized material More protective, levels playing field
Beneficial use requirements	Assumed to be of benefit if fit NASM definition	Must demonstrate benefit (e.g., material must contain phosphorous or raise pH of soil)	Clarifies when a material is a nutrient and when it was a waste and would need a C of A
Application rates	Based on risk of materials and limiting factors specified in protocols and guidelines	Application rates and limits are now in regulation.	More easily enforceable Considers all parameters before determining land application rates
Harvest and grazing periods	One set of restrictions based on crop and livestock type	Same restrictions for higher risk materials, but lower risk materials have reduced periods	Reflects quality of material and promotes use of higher quality material

Water Protection Standards & Requirements

Standard/ Requirement	Old	New	Rationale
Setbacks to wells	100 metres to a municipal well 90 m to other well 15 m to drilled wells	Same for higher risk materials Lower risk materials have reduced setbacks to other wells (30 m)	Setbacks reflect quality and risk of NASM being applied No change for sewage biosolids
Setbacks to surface water	Cannot apply NASM within 20 m of surface water	Same; lower risk materials can be applied closer if certain conditions met	Setbacks reflect quality and risk of NASM being applied No change for sewage biosolids
Depth to bedrock	1.5 m in current guide but standard may be reduced on case-by- case basis; often lower in C of A)	<u>Low risk materials</u> No application on less than 0.3 m from bedrock; additional restrictions between 0.3 m and 0.5 m; no additional restriction if more than 0.6 m <u>Higher risk</u> No application if less than 0.5 m; additional restrictions between 0.5 m and 1 m; no additional restriction more than 1 m	Reflects quality and risk of NASM being applied. Ensures consistent standards across the province. Increased restriction for higher risk material
Depth of unsaturated soil	At least 0.3 m of unsaturated soil required	Higher risk has additional restrictions after 0.3 m; lower risk no additional restrictions after 0.3 m	Standards based on quality of material with increased restrictions for higher risk materials

Other Standards & Requirements

Standard/ Requirement	Old	New	Rationale
Winter application	Application restrictions on ground that is snow covered or frozen for all materials No winter application of sewage biosolids No rules for pulp and paper biosolids	Reduced requirements for low risk materials (e.g., shorter timeframe for incorporation) No application of sewage biosolids in winter New rules for pulp and paper biosolids	Protective Reflects quality of NASM being applied
Odour	General setbacks based on experience	New setbacks from residences and other occupied buildings and areas based on odour units	Specified in regulation. Protects neighbours Approach based on actual field experience and Quebec system
Enforcement	MOE	Same	
Consistency of standards	Standards varied in Cs of A across districts	Standards defined in regulation	Ensures that standards are consistent across the province
Training and certification	Training and certification for brokers, land applicators/ farmers	More comprehensive and clear requirements for training/certification for land applicators/farmers	Ensure certified people are better prepared for duties to manage NASM
Approvals	MOE	OMAFRA	Standards and land application requirements that were part of MOE approvals process are now in regulation
Notification	MOE notifies municipality when C of A approved	OMAFRA to notify municipality when NASM plan approved Land applicator to notify MOE before spreading	Helps plan enforcement activities Ensures municipality is aware of application sites for higher risk materials